

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

LOUISIANA HEALTH SERVICE &  
INDEMNITY CO. D/B/A BLUE CROSS AND  
BLUE SHIELD OF LOUISIANA, *et al.*, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN  
ONCOLOGY, INC., JANSSEN RESEARCH &  
DEVELOPMENT, LLC, and BTG  
INTERNATIONAL LIMITED,

Defendants.

Civil Action No. 19-14146 (KM) (JBC)

SELF-INSURED SCHOOLS OF CALIFORNIA, on  
behalf of itself and all others similarly situated,

Plaintiff,

v.

JANSSEN BIOTECH, INC., JANSSEN  
ONCOLOGY, INC., JANSSEN RESEARCH &  
DEVELOPMENT, LLC, JOHNSON & JOHNSON,  
and BTG INTERNATIONAL LIMITED,

Defendants.

Civil Action No. 19-14291 (KM) (JBC)

**STIPULATION AND CONSENT ORDER**

**IT IS HEREBY STIPULATED** by and among Plaintiffs Self-Insured Schools of California ("SISC") and Louisiana Health Service & Indemnity Co. d/b/a Blue Cross and Blue Shield of Louisiana, *et al.* ("BCBSLA", and collectively with SISC, the "Plaintiffs") and Defendants Janssen Biotech, Inc., Janssen Oncology, Inc., Janssen Research & Development, LLC, and Johnson & Johnson (together, the "Janssen Defendants") and Defendant BTG International Limited ("BTG", and collectively with the Janssen Defendants, the "Defendants") as follows:

**WHEREAS** the deadline for Defendants to answer or otherwise move with respect to the two separate Complaints in both *Self-Insured Schools of California v. Janssen Biotech, Inc., et al.*, 19-cv-14291 (the “SISC Litigation”) and *Louisiana Health Service & Indemnity Co. d/b/a Blue Cross and Blue Shield of Louisiana, et al. v. Janssen Biotech, Inc., et al.*, 19-cv-14146 (the “BCBSLA Litigation”) is September 10, 2019; and

**WHEREAS** on May 31, 2019, while the now consolidated BCBSLA cases were pending in the Eastern District of Virginia, prior to their consolidation and transfer to this Court, counsel for the BCBSLA Plaintiffs filed a motion seeking to set leadership structure and define the roles and responsibilities among the various Plaintiffs’ law firms (the “Leadership Motion”) with respect to the BCBSLA Litigation; and

**WHEREAS** on August 20, 2019, SISC moved to consolidate the SISC Litigation with the BCBSLA Litigation (the “Consolidation Motion”); and

**WHEREAS** the Consolidation Motion and the Leadership Motion are currently pending before this Court; and

**WHEREAS** all parties to the SISC Litigation and BCBSLA Litigation have expressed their assent to consolidation, and Defendants take no position on the issues raised in the Leadership Motion; and

**WHEREAS** the parties have agreed to extend the time for Defendants to respond to the Complaints in order to provide additional time to resolve the issues raised in the Consolidation and Leadership Motions;

IT IS, on this 11<sup>th</sup> day of September 2019,

ORDERED that the deadline for Defendants to answer or otherwise move with respect to the Complaints is hereby extended through and including September 20, 2019; and it is further

ORDERED that Plaintiffs' papers in opposition shall be filed on or before October 21, 2019; and it is further

ORDERED that Defendants' reply papers shall be filed on or before November 11, 2019.

**STIPULATED AND AGREED TO:**

COHN, LIFLAND, PEARLMAN,  
HERRMANN & KNOPF, LLP  
Attorneys for Plaintiff  
SELF-INSURED SCHOOLS OF  
CALIFORNIA

By: s/ Peter S. Pearlman  
PETER S. PEARLMAN

CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.  
Attorneys for Plaintiffs  
LOUISIANA HEALTH SERVICE &  
INDEMNITY COMPANY D/B/A BLUE  
CROSS AND BLUE SHIELD OF  
LOUISIANA, *et al.*

By: s/ James E. Cecchi  
JAMES E. CECCHI

SILLS CUMMIS & GROSS P.C.  
Attorneys for Defendants  
JANSSEN BIOTECH, INC., JANSSEN  
ONCOLOGY, INC. AND JANSSEN  
RESEARCH & DEVELOPMENT LLC, and  
JOHNSON & JOHNSON

By: s/ Jeffrey J. Greenbaum  
JEFFREY J. GREENBAUM

WALSH PIZZI O'REILLY FALANGA LLP  
Attorneys for Defendant  
BTG INTERNATIONAL LTD.

By: s/ Liza M. Walsh  
LIZA M. WALSH

SO ORDERED this 11<sup>th</sup> day of September, 2019



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JAMES B. CLARK, III, U.S.M.J.